

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRITISH TELECOMMUNICATIONS)	
PLC and BT AMERICAS, INC.,)	
)	
Plaintiffs,)	
)	C. A. No.18-1018 (CFC) (MPT)
v.)	
)	
FORTINET, INC.,)	
)	
Defendant.)	

STIPULATION AND [PROPOSED] ORDER

IT IS HEREBY STIPULATED AND AGREED by the parties, subject to the approval of the Court, that the case schedule is amended as follows:

EVENT	DATE SET FORTH IN SCHEDULING ORDER (D.I. 138)	NEW DATE
Motions for Leave to Assert Inequitable Conduct	August 26, 2021	December 10, 2021
Final Infringement Contentions	30 days after close of objection period to Magistrate Judge's Claim Construction R&R if no objections filed or, if objections filed, 30 days after the Court's completion of ruling on objections. Plaintiff reserves the right to amend its Final Infringement Contentions	January 10, 2022

EVENT	DATE SET FORTH IN SCHEDULING ORDER (D.I. 138)	NEW DATE
	should defendant fail to complete its technical document production at least 90 days in advance of this due date.	
Final Invalidity Contentions	45 days after close of objection period to Magistrate Judge's Claim Construction R&R if no objections filed or, if objections filed, 45 days after the Court's completion of ruling on objections	February 7, 2022
Fact Discovery Cutoff	October 29, 2021	March 8, 2022
Opening Expert Reports	December 10, 2021	April 22, 2022
Rebuttal Expert Reports	January 27, 2022	June 10, 2022
Reply Expert Reports	February 24, 2022	July 7, 2022
Completion of Expert Discovery	March 31, 2022	August 12, 2022
Objections to Expert Testimony	April 22, 2022	September 2, 2022
Case Dispositive Motions	April 22, 2022	September 2, 2022
Parties Serve List of Fact Witnesses	30 days following close of expert discovery	30 days following close of expert discovery, or September 12, 2022
Parties Serve List of Rebuttal Fact Witnesses	Within 30 days of Exchange of Fact Witness List	Within 30 days of Exchange of Fact Witness List, or October 12, 2022

EVENT	DATE SET FORTH IN SCHEDULING ORDER (D.I. 138)	NEW DATE
Depositions of any newly disclosed Fact Witnesses	Within 30 days of Exchange of Rebuttal Witness List	Within 30 days of Exchange of Rebuttal Witness List, or November 14, 2022
Proposed Final Pretrial Order	21 days before Pretrial Conference	21 days before Pretrial Conference
Jury Instructions, Voir Dire and Special Verdict Forms	21 days before Pretrial Conference	21 days before Pretrial Conference
Pretrial Conference	September 2022	January 2023
Trial (5 Days)	September 2022	Late January 2023

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August 19, 2021

SO ORDERED this _____ day of _____, 2021.

 UNITED STATES MAGISTRATE JUDGE